

EXHIBIT T

JONES DAY

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Via E-mail

August 14, 2017

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Re: In re Terrorist Attacks of September 11, 2001, 03 MDL 1570

Dear Sean, Scott and Bob:

I am writing to follow up on our meet and confer today. We appreciate your efforts to try to reach an agreement on the list of search terms. As we discussed, 47 search terms remain at issue. As you requested, we have attached a list of those terms as Attachment A. These terms consist of the following:

- a. **17 search terms** to which Dubai Islamic Bank (“DIB”) objected when raised in your earlier discovery requests. *See* Letter from K. Barlow to S. Carter (Mar. 22, 2017) (listing 16 standing objection terms); DIB’s Responses & Objections to Pltfs’ First Set of Requests for Production of Documents Nos. 89, 90, 95 & 102 (Jan. 21, 2011) (objecting to “Human Appeal International”).
- b. **28 search terms** that DIB previously identified as not relevant to a claim or defense of any party and unduly burdensome. *See* Letter from K. Barlow to S. Carter at App. A (Mar. 22, 2017).
- c. **2 search terms** that Plaintiffs only recently sought to add. *See* Letter from S. Tarbutton to S. Cottreau (June 8, 2017).

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Last spring, we requested explanations from you for the inclusion of the 45 terms listed above in paragraphs a and b. On June 2, 2017, Plaintiffs have provided an explanation for only 15 of these 45 terms. *See* Letter from S. Tarbutton to K. Barlow. As we explained on the call, we continue to fail to see the relevance of those 15 terms to the allegations that you have made against DIB. Moreover, we have not received from you any explanation of the relevance of the remaining 30 terms.

Additionally, you raised additional inquiries in your letter dated June 8, 2016. You asked for clarification on search methodology. As we explained in our March 22, 2017 letter:

DIB will “search for exact matches on the search term in the full name accountholder field in DIB’s electronic account record keeping system,” Dkt. 3057, Ex. 3 at 3-4, and in the event that there is a match, DIB will produce “account opening documentation, complete account statements, and any electronic transaction data that exists in its primary legacy account record keeping system” from January 1, 1992 “through 12/31/2004.” Tr. at 59; 60.

You also asked whether DIB will search for aliases or related entity accounts. DIB will provide each accounts that is identified by the methodology above, including accounts that match aliases and entity names that appear on the list of search terms that the parties are trying to negotiate. With respect to Saeed Ahmed Lootah, we will continue to search his account using the methodology that we previously described. *See, e.g.*, Dkt. 3057 at n.3. Lastly, you inquired about whether we produced any documents in response to the Court’s order regarding the embassy bombings. We included responsive documents in our supplemental productions following the March 22, 2016 hearing.

We appreciate your willingness to reexamine your request for the inclusion of the 47 terms that remain at issue. If we can reach agreement, we stand ready as part of our efforts to compromise to search for the 624 terms—which is 124 more terms that Judge Maas permitted—consisting of the 618 terms in our letter of March 22, 2016 plus the 6 terms that we agreed to search from page 2 of your April 21, 2016 letter. We hope that we can avoid troubling the Court again with this issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. T. Cottreau".

Steven T. Cottreau

ATTACHMENT A

1. Special Chechen Refugees Assistance Fund
2. International Islamic Relief Organization
3. International Islamic Charity Organization
4. Nablus Zakat Committee
5. Al Fujairah Charity International
6. Emirates Red Crescent
7. Al Ihsan Charitable Society
8. Dar al Bir Society
9. Jamiat Dubai al Heiriyah
10. Al Shamal Islamic Bank
11. Abdullah Azzam
12. Ali Amin al Rashidi
13. Abu Ubaidah al Banshiri
14. IIRO
15. Igatha
16. Hay'at al-Igatha al-Islamiya al-'Alamiyaa
17. Human Appeal International
18. Al Kdrow
19. Binjad Establishment
20. Healing Miracle Center
21. Rumat International
22. Romat
23. Sana Trading
24. Third World Relief Agency
25. Union Beverages Company
26. Union Beverage Factory
27. World Link Exchange

28. Abdelsamad Mohamed
29. Khalid Ali Walid
30. Mohamed Ahmed Obaid Bin Mahfouz
31. Saleh Salim al Shamsi
32. Dan International Trading & Investment Ltd.
33. Darbar Charity
34. Yasin Ahmed Mohamed Ali
35. Ahmed Mohamed Ali Yasin
36. Binladen Overseas (Pvt Ltd)
37. Fawaz Trading
38. Twaik Est.
39. Abdullah I. Lootah
40. Ahmed Ali Lootah
41. Mahmoud Hamra-Krouha
42. Abu Hamada
43. Saleh Abdelaziz Fahad
44. Sameer Mohamed Mahmoud
45. Yasser al Otaibi
46. Abd al Latif Al Imran
47. Sheikh Mohamed bin Saqar